

SUPPRESSED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

AUG -9 2017

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

SEAN MCCHORD O'DONNELL,

Defendant.

No.

4:17CR00359 AGF/PLC

INDICTMENT

COUNT I

The Grand Jury charges that:

Between November 2016, and January 2017, in St. Louis County, Missouri and St.
Louis, Missouri, within the Eastern District of Missouri, the defendant,

Sean McChord O'Donnell,

the defendant herein, in or affecting interstate commerce, did knowingly recruit, entice, obtain,
advertise, maintain, patronize or solicit by any means a person, Jane Doe, knowing, or in reckless
disregard that Jane Doe had not obtained the age of 18 years, and would be caused to engage in a
commercial sex act.

In violation of Title 18, United States Code, Section 1591(a).

COUNT II

The Grand Jury further charges that:

Between November 2016, and January 2017, in St. Louis County, Missouri and St. Louis, Missouri, within the Eastern District of Missouri, the defendant,

Sean McChord O'Donnell,

the defendant herein, did use facilities of interstate commerce, namely cellular telephones and the internet, with the intent to promote, manage, establish, and carrying on of an unlawful activity, that is prostitution, and thereafter, performed an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity.

In violation of Title 18, United States Code, Section 1952(a)(3).

A TRUE BILL.

FOREPERSON

CARRIE COSTANTIN
Acting United States Attorney

HOWARD J. MARCUS
Assistant United States Attorney